

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-CR-20104-BECERRA

UNITED STATES OF AMERICA

v.

ARCANGEL PRETEL ORTIZ, et al.,

Defendants.

**UNITED STATES' UNOPPOSED MOTION FOR LEAVE
TO EXCEED PAGE LIMIT FOR OMNIBUS RESPONSE TO MOTIONS TO DISMISS**

On October 9, 2025, Defendants Arcangel Pretel Ortiz, Antonio Intriago, Walter Veintemilla, James Solages, and Christian Sanon filed two motions to dismiss their indictments due to purported violations of the Fifth Amendment's Due Process Clause or the Sixth Amendment's Compulsory Process Clause. The Government seeks the Court's leave to file a single, omnibus response to both motions with a 30-page limit.

The defendants' collective motion (sealed filing) and Intriago's individual motion (DE 1203) raise related but distinct issues concerning access to evidence or testimony in Haiti. Intriago's motion focuses on the inability to conduct Rule 15 depositions of Colombian nationals in Haitian custody. *See* (DE 1203:4-7). While the defendants' collective motion raises the same issue, they also argue that they have been denied access to other forms of evidence in Haiti.

The Government's responses to both motions are due on October 23, 2025. The Southern District of Florida's local rules provide a 20-page limit for each response. *See* S.D.F.L. L.R. 7.1(c)(2).

For the sake of judicial economy, the Government requests leave to file a single, omnibus response to both motions with a 30-page limit. A single response would avoid redundancy in

addressing the common issues in both motions, while giving the Government enough space to respond to the numerous factual and legal arguments raised by the defendants.

The Government has contacted counsel for all defendants, who do not oppose this request.

CONCLUSION

The Government respectfully requests the Court's leave to file a single, omnibus response with a 30-page limit to the defendants' two motions to dismiss the indictment.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2025, I filed the foregoing document through CM/ECF and thus served all counsel of record.

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